

DEPARTMENT OF INSURANCE**Legal Division, Government Law Bureau**

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Sacramento, CA 95814

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TO: Certain Interested and Affected Parties
FROM: Christopher A. Citko
DATE: September 7, 2007
**RE: Invitation to Pre-notice Public Discussions on Possible Regulations
Governing Employer Group and Association Fees Paid by Workers'
Compensation Insurance Companies**

Pursuant to California Government Code Section 11346.45, California Insurance Commissioner Steve Poizner will hold pre-notice public discussions regarding possible regulations governing the payment of employer group and association fees by workers' compensation insurance companies. The Department will receive information and evaluate the current situation involving the payment of fees by workers' compensation insurance carriers to employer groups and associations that have been established pursuant to California Insurance Code Section 11656.6.

You are hereby invited to participate in these pre-notice public discussions. The purpose of these discussions is to permit certain interested and affected persons an opportunity to present statements or comments with respect to the advisability and extent of regulations governing the payment of fees to employer groups and associations by workers' compensation insurance carriers.

Public discussions will be held on the following two dates, at the times and locations specified below:

Date: October 10, 2007
Location: Junipero Serra State Building
Auditorium
107 South Broadway
Los Angeles, CA 90012
Time: 10 a.m. to 12:00 noon; 1:30 p.m. to 3:00 p.m. The discussions will end at 3:00 p.m. or as soon after 10:00 a.m. as all those wishing to speak have spoken, whichever is earlier.

Date: October 12, 2007
Location: EDD Auditorium
First Floor
722 Capitol Mall
Sacramento, CA 95814
Time: 10 a.m. to 12:00 noon; 1:30 p.m. to 3:00 p.m. The discussions will end at 3:00 p.m. or as soon after 10:00 a.m. as all those wishing to speak have spoken, whichever is earlier.

The facility to be used for these public discussions is accessible to persons with mobility impairments. Persons with sight or hearing impairments are requested to notify the undersigned, by October 3, 2007 in order to make special arrangements.

Space is limited so we ask that you limit your organization's representation to one individual.

Please be advised that participation in these prenotice public discussions will be in addition to, and not in substitution for, participation in any formal rulemaking process that may ensue. This invitation to prenotice public discussions does not constitute a Notice of Proposed Action under the Administrative Procedure Act. Consequently, comments (oral or written) received in connection with these prenotice public discussions will not be included in the rulemaking file, which would not be opened until such time as formal notice were issued. Similarly, the Department is not required to respond to comments received before a Notice of Proposed Action has been published and a rulemaking file opened. For this reason, if you wish to have comments included in the rulemaking file, or to require the Department to respond to them as part of the process by which it may adopt this regulation, you must present your comments during the formal public comment period according to the procedures outlined in the Notice of Proposed Action at such time as that document may be issued, regardless of whether the comments have been made in connection with these prenotice public discussions. The Commissioner nonetheless welcomes your participation in these discussions, and hopes that any regulations that may subsequently be proposed can benefit from your input.

All inquiries regarding these prenotice public discussions should be directed to the undersigned.

Participants are requested to RSVP by October 3, 2007. Please RSVP by providing to **Drake Shogun** your name, the name of the organization (if any) which you represent, your mailing address, telephone number, and email address.

RSVP to:
Drake Shogun
Policy Initiatives Office, California Department of Insurance
300 Capitol Mall, Suite 1600
Sacramento CA 95814
Phone: (916) 492-3535
Fax: (916) 322-7294
Email: shogund@insurance.ca.gov

/s/
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